



October 14, 2020

The Honorable Greg Lippe, President
California Board of Pharmacy
2720 Gateway Oaks Drive, Suite 100
Sacramento, CA 95833

Re: **Pharmacy Technician Immunization Administration**

Dear Mr. Lippe,

The California Retailers Association (CRA) and the National Association of Chain Drug Stores (NACDS) write to request that the Board of Pharmacy join our organizations in support of expanded access to immunizations in California by leveraging the skills of our entire pharmacy teams. As the flu season rapidly approaches and the COVID-19 vaccine becomes available, California must bring all resources to bear to ensure patients are able to easily access these vaccines not only in the near term but the long term as well. We would like to work with you to explore options to enable pharmacy technicians to administer vaccinations as part of the pharmacy team.

Due to COVID-19 and the increased public awareness on the importance of vaccinations, especially this flu season, our members are experiencing significantly higher demand for flu vaccinations. A recent Reuters poll¹ found that 60 percent of adults in the United States are planning to be vaccinated, up from 45 percent during the 2018-19 flu season. Many of the other places where patients typically get vaccinated (e.g. schools, offices, universities), may be closed and inaccessible to patients, resulting in greater pressure and demand on pharmacies to administer the vaccine.

Several other states have taken steps to allow pharmacy technicians to immunize, including Idaho, Indiana, Rhode Island, Utah and Washington. Currently, Iowa and Michigan have technician immunization pilot studies and other states are actively exploring this authorization. In Idaho alone, pharmacy technicians administered 25,000

¹ 60% of U.S. adults plan to get seasonal flu vaccine: Reuters/Ipsos poll. May 26, 2020
<https://www.reuters.com/article/us-health-coronavirus-flu-poll/60-of-u-s-adults-plan-to-get-seasonal-flu-vaccine-reuters-ipsos-poll-idUSKBN23220X>

vaccines during the first year they were granted the authority with no errors or patient safety issues reported to the Idaho Board of Pharmacy.²

In normal, non-COVID-19 years, emergency rooms and urgent care clinics are often flooded with flu patients during the fall and winter months. As we anticipate the increased demand for the flu vaccine and the potential for a COVID-19 vaccine, pharmacies must be able to utilize their trained pharmacy technicians to administer vaccinations and prevent unnecessary emergency room and clinic visits.

All 50 states and the District of Columbia allow pharmacists to administer flu, pneumococcal and herpes zoster vaccines, usually along with others, under various restrictions.³ While pharmacy-based vaccination has meaningfully improved vaccine uptake for over two decades, emphasis has been placed primarily on pharmacists as vaccinators. However, in recent years, pharmacy technicians have demonstrated success in the technical task of vaccine administration, and in such models, pharmacists maintain responsibility for all aspects requiring clinical or professional judgement. In fact, the time pharmacists can spend providing clinical care is highly dependent on the breadth of technical tasks that can be delegated to pharmacy technicians. Such delegation is similar to how physician practices utilize support staff, such as medical assistants, to perform the technical task of an immunization so the physician best utilizes their time on clinical patient care activities.

Proactively authorizing pharmacy technicians to provide vaccines in advance of influenza season will allow pharmacies to plan and adapt care delivery models to provide increased vaccine capacity and optimally serve patients this fall and winter. Now more than ever, undue restrictions on pharmacy staff should be lifted for the greater good, to help meet public health goals for vaccination during this critical and unprecedented time.

Further, as we prepare for the widespread availability of a COVID-19 vaccine, it will be critical to ensure that the entire pharmacy team is leveraged in its initiation and administration. Allowing pharmacy technicians to administer the COVID-19 vaccine will aid in the state's efforts to keep well patients out of institutional settings to mitigate the spread of the virus.

The California Retailers Association is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, restaurants, convenience stores, supermarkets and grocery stores, chain drug, and specialty retail such as auto, vision, jewelry, hardware and home stores. CRA works on behalf of California's retail industry, which currently operates over 400,000 retail establishments with a gross domestic product of \$330 billion annually and employs over 3 million people—one fourth of California's total employment.

² Alex Adams, Shane Desselle and Kimberly McKeirnan. "Pharmacy technician-administered vaccines: on perceptions and practice reality." *Pharmacy* 6.4 (2018): 124. <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6306786/>

³ Pharmacist Administer Vaccinations. APhA and NASPA. January 2019. https://media.pharmacist.com/practice/IZ_Authority_012019.pdf

The National Association of Chain Drug Stores represents traditional drug stores, supermarkets and mass merchants with pharmacies. Chains operate over 40,000 pharmacies, and NACDS' over 80 chain member companies include regional chains, with a minimum of four stores, and national companies. Chains employ nearly 3 million individuals, including 157,000 pharmacists. They fill over 3 billion prescriptions yearly, and help patients use medicines correctly and safely, while offering innovative services that improve patient health and health care affordability.

CRA and NACDS strongly urge the Board to explore authorizing pharmacy technicians to perform the technical task of administering immunizations through an Executive Order immediately, and via legislation in 2021. Such action will better support pharmacies to meet the growing need for widespread vaccine access. These unprecedented times require new models of care and innovative practices that leverage all healthcare resources and deploy all skills to best support and care for the public. We welcome the opportunity to work with you to optimize the capacity of pharmacies to provide much needed vaccinations and other services across the state.

Please do not hesitate to contact Jennifer Snyder or Lindsay Gullahorn with Capitol Advocacy at jsnyder@capitoladvocacy.com or lgullahorn@capitoladvocacy.com to discuss further.

Sincerely,

A handwritten signature in blue ink, appearing to read "Rachel Michelin".

Rachel Michelin
President
California Retailers Association

A handwritten signature in black ink, appearing to read "Steve C. Anderson".

Steve C. Anderson, FASAE, CAE, IOM
President & Chief Executive Officer
National Association of Chain Drug Stores